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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Linda Tirado,

Case No: 20-CV-01338 (JRT/ECW)

Plaintiffs,

v.

**DEFENDANT MINNEAPOLIS  
POLICE LIEUTENANT ROBERT  
KROLL'S MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT  
PURSUANT TO RULE 12(B)(6)**

City of Minneapolis; Minneapolis Chief of Police Medaria Arradondo *in his official capacity*; Minneapolis Police Lieutenant Robert Kroll, *in his and official capacity*; Minnesota Department of Public Safety Commissioner John Harrington, *in his official capacity*, Minnesota State Patrol Colonel Matthew Langer, *in his official capacity*; and John Does 1-4, *in their individual and official capacities*,

Defendants.

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**TO: PLAINTIFF LINDA TIRADO, THROUGH HER ATTORNEY JOHN M. BAKER, 222 S. NINTH STREET, SUITE 2200, MINNEAPOLIS, MINNESOTA 55402**

**MOTION**

Pursuant to Fed. R. Civ. P. 12(b)(6), Defendant Minneapolis Police Lieutenant Robert Kroll hereby moves the United States District Court, District of Minnesota for an Order to dismiss Plaintiff's Complaint for failure to state a claim upon which relief can

be granted. Said Motion is based upon the attached Memorandum of Law and all of the files, records, and proceedings herein.

A hearing date has not yet been obtained. The date for submission of the responsive brief will be 21 days from the filing of the motion. The reply brief will be due 14 days after that.

Respectfully submitted,

**KELLY & LEMMONS, P.A.**

Dated: July 6, 2020

/s/ Joseph A. Kelly  
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Lieutenant Robert Kroll*